

**NORTH CAROLINA DIVISION OF
AIR QUALITY**

Air Permit Review

Permit Issue Date: DRAFT

Region: Winston-Salem Regional Office
County: Rockingham
NC Facility ID: 7900138
Inspector's Name: Maria Aloyo
Date of Last Inspection: 07/25/2017
Compliance Code: 3 / Compliance - inspection

Facility Data Applicant (Facility's Name): Loparex LLC Facility Address: Loparex LLC 816 Fieldcrest Road Eden, NC 27288 SIC: 2672 / Paper Coated And Laminated, Nec NAICS: 322222 / Coated and Laminated Paper Manufacturing Facility Classification: Before: Title V After: Title V Fee Classification: Before: Title V After: Title V				Permit Applicability (this application only) SIP: NSPS: RR NESHAP: DDDDD, EEEE, JJJJ, ZZZZ PSD: PSD Avoidance: VOC NC Toxics: 112(r): Other:			
Contact Data				Application Data			
Facility Contact Chip Sheeran Technical Manager (336) 627-6416 816 Fieldcrest Road Eden, NC 27288	Authorized Contact David Laflamme Plant Manager (336) 627-6464 816 Fieldcrest Road Eden, NC 27288	Technical Contact Chip Sheeran Technical Manager (336) 627-6416 816 Fieldcrest Road Eden, NC 27288	Application Number: 7900138.15A Date Received: 03/02/2015 Application Type: Renewal Application Schedule: TV-Renewal Existing Permit Data Existing Permit Number: 08031/T14 Existing Permit Issue Date: 10/10/2013 Existing Permit Expiration Date: 11/30/2015				
Total Actual emissions in TONS/YEAR:							
CY	SO2	NOX	VOC	CO	PM10	Total HAP	Largest HAP
2014	0.0400	7.89	91.97	6.64	2.03	17.84	16.13 [Toluene]
2013	0.0400	7.81	85.05	6.56	1.97	16.81	15.24 [Toluene]
2012	0.0400	7.27	68.57	6.08	1.78	14.70	13.37 [Toluene]
2011	0.0400	6.98	74.48	5.84	1.81	16.72	14.62 [Toluene]
2010	0.0200	5.58	36.50	4.68	1.98	13.54	11.70 [Toluene]
Review Engineer: Jenny Sheppard Review Engineer's Signature:					Comments / Recommendations: Issue 08031/T15 Permit Issue Date: DRAFT Permit Expiration Date:		
Date: DRAFT							

1. Purpose of Application:

This permit modification is a renewal of an existing Title V permit for Loparex, LLC. The existing Title V permit number **08031T14** was issued on **October 10, 2013**, and was scheduled to expire on November 30, 2015. The renewal application was postmarked/received on February 12, 2015, or at least nine months prior to the expiration date. Therefore, the existing permit shall not expire until the renewal permit has been issued or denied pursuant to 2Q .0513.

2. Facility Description

The facility manufactures silicone coated release liners and other pressure sensitive papers used to release adhesives and handling stickers as well as other products.

3. History/Background/Application Chronology

December 6, 2010 – Permit 08081T09, TV Renewal and 112(j) Part II modification.

February 1, 2011 – Permit 08031T10, TV Minor modification to add third silicone coating line (Line No. 3).

February 6, 2012 – Permit 08031T11, TV Minor modification to add silicone coating lines 4 and 5.

July 17, 2012 – Permit 08031T12, TV Minor modification to remove boiler ES-BL01 and add boiler ES-BL02 and associated MACT DDDDD.

April 30, 2013 – Permit 08031T13, TV Minor modification to add boiler ES-BL01 back to the permit as a backup to ES-BL02

October 10, 2013 – Permit 08031T14, TV Minor modification to add two insignificant activities.

4. Permit Modifications/Changes and ESM Discussion

The following table describes the modifications to the current permit as part of the renewal process.

Pages	Section	Description of Changes
Attachment	Insignificant activities	
Cover	-	-amended all dates and permit revision numbers
All	Header	-updated permit revision number
3-4	Equipment table	-updated page numbers for equipment
All	All	Added 0 to 2D and 2Q throughout the permit
5-20	2.1 and 2.2	Updated all condition language to current, removed 02D .0958 ref and condition
20-28	General Conditions	Updated to current general conditions
29	List of Acronyms	Updated the list of Acronyms to current

5. Regulatory Review

The facility is currently subject to the following regulations:

15A NCAC 02D .0503, Particulates from Fuel Burning Indirect Heat Exchangers
15A NCAC 02D .0515, Particulates from Miscellaneous Industrial Processes
15A NCAC 02D .0516, Sulfur Dioxide Emissions from Combustion Sources
15A NCAC 02D .0521, Control of Visible Emissions
15A NCAC 02D .0524, New Source Performance Standards (40 CFR 60, Subpart RR)
15A NCAC 02D .0958, Work Practices for Sources of Volatile Organic Compounds (removed)

15A NCAC 02D .1111, Maximum Achievable Control Technology (40 CFR 63, Subparts EEEE, JJJJ, and DDDDD)

15A NCAC 02D .1806, Control and Prohibition of Odorous Emissions

15A NCAC 02Q .0317, Avoidance Conditions (15A NCAC 2D .0530, Prevention of Significant Deterioration, VOC)

A regulatory review for these current permit conditions will not be included in this document. Where applicable, the permit conditions have been modified to reflect current working shell conditions.

6. NSPS, NESHAPS/MACT, PSD, 112(r), CAM

NSPS – The Permittee is subject to the New Source Performance Standards for Pressure Sensitive Tape and Label Surface Coating Operations (40 CFR 60, Subpart RR). The Permittee is required to limit VOC emissions from these sources to less than 0.20 kilograms VOCs per kilogram coating solids applied as on a weighted average basis for one calendar month or demonstrate for each affected facility the required overall VOC compound emission reduction as calculated over a calendar month is at least 90 percent. The current permit includes compliance procedures, monitoring, recordkeeping, and reporting requirements. This permit renewal does not affect this status.

NESHAPS/MACT/112i – The Permittee is currently subject to several Maximum Achievable Control Technology Standards. National Emission Standards for Hazardous Air Pollutants from Paper and Other Web Coating (40 CFR 63, Subpart JJJJ). National Emission Standards for Hazardous Air Pollutants from Organic Liquids Distribution (non-gasoline) (40 CFR 63, Subpart EEEE), National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (40 CFR 63, Subpart ZZZZ) National Emission Standards for Hazardous Air Pollutants (NESHAP) from New and Existing Industrial, Commercial, and Institutional Boilers and Process Heaters at Major Sources under 40 CFR 63, Subpart DDDDD. The current permit includes the compliance, monitoring, recordkeeping and reporting requirements for this MACT.

There are no changes to the requirements for this permit renewal and continued compliance is expected.

112(r) – The facility is not subject to Section 112(r) of the Clean Air Act requirements because it does not store any of the regulated substances in quantities above the thresholds in the Rule. This permit renewal does not affect this status.

CAM – 40 CFR 64 requires that a continuous compliance assurance monitoring plan be developed for all equipment located at a major facility, that have pre-controlled emissions above the major source threshold, and use a control device to meet an applicable standard. A Compliance Assurance Monitoring Plan review was conducted as part of the renewal of the permit in 2010. In the review, it was determined that for the emission sources that were currently installed that a CAM plan was not required at that time. Since 2010, the facility has added three coating lines and an additional boiler. The compliance assurance monitoring (CAM) rule requires owners and operators to conduct monitoring to provide a reasonable assurance of compliance with applicable requirements under the act. Monitoring focuses on emissions units that rely on pollution control device equipment to achieve compliance with applicable standards. An emission unit is subject to CAM, under 40 CFR Part 64, if all of the following three conditions are met:

- The unit is subject to any (non-exempt, e.g., pre-November 15, 1990, Section 111 or 112 standard) emission limitation or standard for the applicable regulated pollutant.
- The unit uses any control device to achieve compliance with any such emission limitation or standard.
- The unit's pre-control potential emission rate exceeds 100 percent of the amount required for a source to be classified as a major source; i.e., either 100 tpy (for criteria pollutants) or 10 tpy of any individual/25 tpy of any combination of HAP.

The emission sources installed since the last CAM review are uncontrolled therefore a CAM review is not needed at this time.

7. Facility Wide Air Toxics

The majority of the permitted emission sources at Loparex which emit toxic air pollutants are subject the NESHAP (MACT) for Paper and Other Web Coating in 40 CFR 63 Subpart JJJJ. These sources are now exempt from NC air toxic rules in accordance with NC House Bill 952.

8. Facility Compliance Status/Compliance History:

The facility was last inspected by Maria Aloyo of the WSRO on July 25, 2017. Based on her observations and records review, the facility was found to be in likely compliance with its Title V Air Permit and all applicable DAQ regulations.

“On March 18, 2015, Hilary King, formerly of DAQ-WSRO conducted a compliance inspection and discovered that the capture system for the direct-fired two-zone natural gas-fired silicone dryer (ES-11) had been operated below 0.007 inches of water column differential pressure from February 2014 until December 10, 2014. Additionally, the facility did not have their Site-Specific Monitoring Plan available during the March 18, 2015 compliance inspection. As a result, a NOV was issued on April 6, 2015. These are violations of 40 CFR 63, Subpart JJJJ. The facility responded on April 23, 2015 and stated that DAQ was notified of the capture system pressure differential issue before the compliance inspection and that the problem had been corrected. Also, they stated that the Site-Specific Monitoring Plan was available and that due to miscommunication during the inspection the plan was not provided. No other NODs, NOVs, or NOV/NREs have been issued to the facility in the last five years.”

9. Public Notice/EPA and Affected State(s) Review

A notice of the DRAFT Title V Permit shall be made pursuant to 15A NCAC 02Q .0521. The notice will provide for a 30-day comment period, with an opportunity for a public hearing. Consistent with 15A NCAC 02Q .0525, the EPA will have a concurrent 45-day review period. Copies of the public notice shall be sent to persons on the Title V mailing list and EPA. Pursuant to 15A NCAC 02Q .0522, a copy of each permit application, each proposed permit and each final permit pursuant shall be provided to EPA. Also, pursuant to 02Q .0522, a notice of the DRAFT Title V Permit shall be provided to each affected State at or before the time notice is provided to the public under 02Q .0521 above. The State of Virginia and the Forsyth County Local Program are affected state/local program within 50 miles of the facility.

The following comments were received: **(TO BE COMPLETED AFTER PUBLIC and EPA COMMENT PERIOD.)**

10. Conclusions, Comments, and Recommendations

A professional engineer's seal was not required for the renewal application.

A consistency determination was not required for the renewal application.

WSRO recommends issuance of the permit and was sent a DRAFT permit prior to issuance. **(TO BE COMPLETED AFTER REGIONAL COMMENTS ARE RECEIVED)**

RCO concurs with WSRO's recommendation to issue the renewed air permit. **(TO BE COMPLETED AFTER PUBLIC and EPA COMMENT PERIOD.)**